

Exhibit 1

<p style="text-align: right;">Page 22</p> <p>1 - WILL GRANNIS -</p> <p>2 product success role, was that an Eng role?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. The role that I was hired into was</p> <p>5 a -- I believe it was program management was</p> <p>6 the -- was the function.</p> <p>7 Q. Did it have an engineering component?</p> <p>8 A. Yes.</p> <p>9 Q. And what was that component?</p> <p>10 A. I was expected to be the subject</p> <p>11 matter expert on all Cloud technologies ranging</p> <p>12 from artificial intelligence, streaming analytics,</p> <p>13 computation, storage, networking, and to provide</p> <p>14 recommendations to the business on where we should</p> <p>15 invest our go-to market resources based on the</p> <p>16 strength -- relative strengths or weaknesses of</p> <p>17 our products.</p> <p>18 Q. Did it have a product management</p> <p>19 component?</p> <p>20 A. I -- no.</p> <p>21 Q. When you came into that role, what</p> <p>22 was your title?</p> <p>23 A. Director, and I don't -- I don't know</p> <p>24 if it was customer success, product success.</p> <p>25 It's -- I don't recall the exact title at the</p>	<p style="text-align: right;">Page 24</p> <p>1 - WILL GRANNIS -</p> <p>2 firsthand -- real firsthand experience whether it</p> <p>3 was hands-on or leadership that we would make -- I</p> <p>4 was offered to start this role up and at the time</p> <p>5 it was scoped to be a very small thing and an</p> <p>6 experimental function.</p> <p>7 Q. What was the title or descriptive</p> <p>8 title of that role?</p> <p>9 A. Director, office of the CTO.</p> <p>10 Q. Did that role include an engineering</p> <p>11 component?</p> <p>12 A. Yes, the -- eventually. So part of</p> <p>13 creating a team was -- actually was also creating</p> <p>14 the -- the features of the -- the function itself.</p> <p>15 It was a new function at Google.</p> <p>16 Q. And did that function gain a name?</p> <p>17 A. Yes.</p> <p>18 Q. And what was the name?</p> <p>19 A. The Office of the CTO was the name of</p> <p>20 the group and the function, we decided to utilize</p> <p>21 a technical job family that had been used</p> <p>22 elsewhere in Google and put it in engineering for</p> <p>23 the first time.</p> <p>24 Q. What do you mean, "put it in</p> <p>25 engineering"?</p>
<p style="text-align: right;">Page 23</p> <p>1 - WILL GRANNIS -</p> <p>2 time.</p> <p>3 Q. Do you recall what your level was?</p> <p>4 A. L 8.</p> <p>5 Q. Do you recall what job ladder that</p> <p>6 was in?</p> <p>7 A. Program management.</p> <p>8 Q. When was your start date?</p> <p>9 A. It was the end of March, '2015</p> <p>10 approximately.</p> <p>11 Q. And how long were you in that role?</p> <p>12 A. It was roughly a year.</p> <p>13 Q. And where did you go next?</p> <p>14 A. My next role was starting the office</p> <p>15 of the CTO.</p> <p>16 Q. And how did it come to be that you</p> <p>17 made a move into the office of the CTO?</p> <p>18 A. I was asked to formulate -- because</p> <p>19 of my background in enterprise technology both in</p> <p>20 startups and in large enterprises, I was asked to</p> <p>21 provide thoughts and opinions to leadership around</p> <p>22 building such a function.</p> <p>23 And at the time I was told based on</p> <p>24 high performance in the role, demonstrated</p> <p>25 knowledge of the products and, you know,</p>	<p style="text-align: right;">Page 25</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Our job families can exist. So the</p> <p>3 job family that was used for the office of the CTO</p> <p>4 had certain elements that we wanted to bring</p> <p>5 across and we knew that engineering, the core of</p> <p>6 the team would be critical to have engineering</p> <p>7 skills.</p> <p>8 And so we took the features of a job</p> <p>9 that allowed for a blend of customer facing,</p> <p>10 customer impact-type work, plus engineering-type</p> <p>11 work and we put it in engineering, meaning it was</p> <p>12 in the engineering hierarchy which allow the</p> <p>13 members of the team to participate in the larger</p> <p>14 engineering organization whether that was, you in,</p> <p>15 you know, developing or in more engineering-like</p> <p>16 reviews.</p> <p>17 Q. Was -- the technical job family</p> <p>18 you -- you talked about, was that technical</p> <p>19 solutions consultant?</p> <p>20 A. Yes.</p> <p>21 Q. And so there were technical solutions</p> <p>22 consultants outside of OCTO at the time you</p> <p>23 adopted that title?</p> <p>24 A. We don't -- we don't refer to</p> <p>25 technical solutions consultant and the job family</p>

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<p style="text-align: right;">Page 26</p> <p>1 - WILL GRANNIS -</p> <p>2 as the title. The title is what we use like</p> <p>3 Director, Office of the CTO, but as a job family,</p> <p>4 that is -- that is what we adopted.</p> <p>5 Q. So the technical solutions consultant</p> <p>6 job family as it existed in OCTO was different</p> <p>7 than as it existed elsewhere in Google Cloud; is</p> <p>8 that right?</p> <p>9 A. Yes, there -- there was a heavier</p> <p>10 emphasis on engineering.</p> <p>11 Q. Did the function include a product</p> <p>12 management component?</p> <p>13 A. No.</p> <p>14 Q. At some point, did your job level</p> <p>15 change?</p> <p>16 A. Yes.</p> <p>17 Q. When was that?</p> <p>18 A. I don't recall exactly, but it was</p> <p>19 roughly I think between two and three years of my</p> <p>20 time in Google.</p> <p>21 Q. Was it in connection with a</p> <p>22 promotion?</p> <p>23 A. Yes.</p> <p>24 Q. Did your job role change at the time</p> <p>25 of the promotion?</p>	<p style="text-align: right;">Page 28</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Yes, I hold that role and then my</p> <p>3 role is also combined with Brian's role.</p> <p>4 Q. And what was Brian's title --</p> <p>5 A. He was --</p> <p>6 Q. -- at the time you reported to him?</p> <p>7 A. He held two titles throughout our</p> <p>8 time; first he was head of product management when</p> <p>9 I had first reported to him and then he became the</p> <p>10 CTO while I was reporting to him.</p> <p>11 Q. And so presently what is the</p> <p>12 descriptive title that you use for your position?</p> <p>13 A. Managing Director, Office of the CTO.</p> <p>14 Q. Did you choose that title?</p> <p>15 A. I'm just thinking back to the -- the</p> <p>16 origin of how the title came up.</p> <p>17 Q. Sure.</p> <p>18 A. So managing director is a</p> <p>19 convention -- a pretty standard convention used</p> <p>20 for L 9 on the TSC -- in the TSC job family. So I</p> <p>21 don't -- I don't recall actually it being a</p> <p>22 conscious conversation between, you know, anyone.</p> <p>23 It was more of a -- with the promotion, the -- the</p> <p>24 job title came. It also reflects the nature of my</p> <p>25 role, which is the managing director of the -- the</p>
<p style="text-align: right;">Page 27</p> <p>1 - WILL GRANNIS -</p> <p>2 A. No.</p> <p>3 Q. When you -- going back to the job</p> <p>4 family piece of this, you said it allowed for</p> <p>5 participation in the engineering hierarchy. Did</p> <p>6 that include being considered part of Eng for</p> <p>7 purposes of -- of Eng conferences that Google</p> <p>8 would put together?</p> <p>9 A. Yes.</p> <p>10 Q. And participation on things like the</p> <p>11 Eng Listserv?</p> <p>12 A. Yes.</p> <p>13 Q. Who did you report to in that role?</p> <p>14 MR. GAGE: Objection.</p> <p>15 Q. In the role that you held within</p> <p>16 OCTO, who did you report to?</p> <p>17 A. I reported to Brian Stevens.</p> <p>18 Q. Are you still in that role in OCTO?</p> <p>19 A. Is -- is your question do I still</p> <p>20 report to Brian Stevens?</p> <p>21 Q. No. I'm -- I'm aware I think that</p> <p>22 Mr. Stevens has left.</p> <p>23 My question is: The job role that</p> <p>24 you held, have you continued to hold that role up</p> <p>25 till today?</p>	<p style="text-align: right;">Page 29</p> <p>1 - WILL GRANNIS -</p> <p>2 organization.</p> <p>3 Q. Okay. Are you in the -- are you in</p> <p>4 the TSC job ladder?</p> <p>5 A. I am.</p> <p>6 Q. At the time you took on the position,</p> <p>7 was there a job ladder that applied?</p> <p>8 A. When I took the position of, which</p> <p>9 position? The original --</p> <p>10 Q. When you were in OCTO, the time you</p> <p>11 took the position in OCTO had the TSC job ladders</p> <p>12 for OCTO been developed?</p> <p>13 A. No.</p> <p>14 Q. So you've had the opportunity to work</p> <p>15 with Ms. Rowe while she's been at Google, correct?</p> <p>16 A. Yes.</p> <p>17 Q. In what capacity?</p> <p>18 A. Hiring manage --</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. Hiring manager, direct manager twice.</p> <p>21 Q. And as her direct manager, what has</p> <p>22 been the frequency of your interactions with her?</p> <p>23 A. As her direct manager we've had</p> <p>24 standing one-to-ones since she started at -- at</p> <p>25 Google, and then in the period of time when she</p>

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<p style="text-align: right;">Page 30</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 did not report to me I was also someone that she</p> <p>2 would come to for advice.</p> <p>3 Q. And how frequently as the direct</p> <p>4 manager did you have one-to-ones with her?</p> <p>5 A. The -- the normal schedule was every</p> <p>6 two weeks unless it was interrupted by some type</p> <p>7 of vacation, time off, other circumstances; but</p> <p>8 it's all of my direct reports and I, we have a</p> <p>9 one-to-one on a standing schedule.</p> <p>10 At -- at the beginning it was every</p> <p>11 week, then it went to every two weeks and then</p> <p>12 over time I found that many of my direct reports</p> <p>13 choose to go once a month, but generally speaking</p> <p>14 it was very frequent.</p> <p>15 Q. And were there times that you</p> <p>16 interacted outside of your normally scheduled</p> <p>17 one-to-ones?</p> <p>18 A. Yes.</p> <p>19 Q. And what would be the types of</p> <p>20 circumstances where you would interact outside of</p> <p>21 one-to-ones?</p> <p>22 A. As I recall, most of those</p> <p>23 interactions were initiated by Ulku asking me a</p> <p>24 question on a specific circumstance.</p> <p>25</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 detail, so it will probably help. OCTO, the job</p> <p>2 family as seen in the job description and in OCTO</p> <p>3 as we've described since the very beginning of the</p> <p>4 CTO office, the role consists of three main we'll</p> <p>5 call them buckets of work. There's customer work,</p> <p>6 there's influencing the platform and products, and</p> <p>7 then there is the speaking, the evangelism part.</p> <p>8 In order to create impact with the</p> <p>9 customer OCTOs are expected to help materially</p> <p>10 advance the progress of the largest brands in the</p> <p>11 world; and what I mean by that is, you know, come</p> <p>12 to Cloud, come to Google Cloud and succeed with</p> <p>13 Google Cloud.</p> <p>14 The second pillar, the engineering</p> <p>15 pillars, are expected to take their knowledge from</p> <p>16 the corporate world and what they obtain at Google</p> <p>17 and they're expected to show impact on the product</p> <p>18 road map, and this can come in a variety of</p> <p>19 fashions. Most often this means that they have</p> <p>20 championed a change that we need make to what</p> <p>21 we're building that it is accepted by the</p> <p>22 engineering, production, leadership.</p> <p>23 And the third pillar is conveying the</p> <p>24 power of our technology to the outside world</p> <p>25</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And in your interactions with her,</p> <p>2 have you found her to be professional?</p> <p>3 A. Yes.</p> <p>4 Q. Have you found her to be</p> <p>5 knowledgeable with respect to her subject area?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. As documented in performance reviews,</p> <p>8 there are three categories. You know, when you</p> <p>9 say "knowledgeable," that requires a view across</p> <p>10 the three categories of the role. There's a</p> <p>11 customer element of the role, there's an</p> <p>12 engineering element of the role, and there's an</p> <p>13 evangelism element of the role.</p> <p>14 Ulku has demonstrated as -- you know,</p> <p>15 as shown in her performance reviews she's</p> <p>16 demonstrated acumen and knowledge; significant</p> <p>17 knowledge in evangelism, knowledge of financial</p> <p>18 services and customers, but impact knowledge on</p> <p>19 the engineering pillar has been less than the</p> <p>20 average in OCTO.</p> <p>21 Q. And tell me what that means, "impact</p> <p>22 knowledge."</p> <p>23 A. What that means is the sec -- the --</p> <p>24 if I may describe the three in a little more</p> <p>25</p>	<p style="text-align: right;">Page 33</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 and helping create a translation between our</p> <p>2 technology and its possibilities in the context of</p> <p>3 the day; and in this way Ulku for example spent</p> <p>4 most of her time explaining the power of</p> <p>5 technology to financial services organizations and</p> <p>6 regulators, organizations like that externally.</p> <p>7 Q. So we'll come back to some of this.</p> <p>8 With respect to the second bucket,</p> <p>9 influencing the platform products and the</p> <p>10 engineering piece -- do I have that right, that's</p> <p>11 the second bucket?</p> <p>12 A. Yes.</p> <p>13 Q. Describe for me a little bit more</p> <p>14 about the engineering aspect of -- of the role,</p> <p>15 what it means to impact -- have an impact on the</p> <p>16 product road map.</p> <p>17 A. Examples of impact can range from</p> <p>18 conceiving of a design of a new product and</p> <p>19 ensuring that it's built. It can be spotting an</p> <p>20 opportunity to evolve something that we already</p> <p>21 have and make it better.</p> <p>22 And it -- I think it's critical to</p> <p>23 point out that the idea itself is only a little</p> <p>24 bit of the role, that the -- the full as, you</p> <p>25</p>

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<p style="text-align: right;">Page 34</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 know, shown in and is discussed in -- in I think</p> <p>2 numerous performance reviews of Ulku, you know,</p> <p>3 the -- the critical part is making sure that the</p> <p>4 engineering changes are accepted and driven into</p> <p>5 our baseline product road map.</p> <p>6</p> <p>7 So there's a component that's, you</p> <p>8 know, spotting something, but the much more</p> <p>9 important component is the landing of that idea in</p> <p>10 what we build.</p> <p>11 Q. And working directly with engineers</p> <p>12 on that, is that also part of the role?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. When did you start to build</p> <p>15 out the TSC ladder within OCTO?</p> <p>16 A. Within weeks of deciding that we</p> <p>17 wanted to do this and deciding that the TSC job</p> <p>18 family was the best -- was the closest fit to what</p> <p>19 we were trying to achieve.</p> <p>20 Q. Do you recall what year that was?</p> <p>21 A. Yes, it was 2016.</p> <p>22 Q. And what did you do -- well, first of</p> <p>23 all, what positions did you identify that you</p> <p>24 wanted to hire on the TSC ladder in OCTO?</p> <p>25 A. The original job description mirrored</p>	<p style="text-align: right;">Page 36</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. I don't recall there being.</p> <p>2 Q. And the technical director position,</p> <p>3 do you recall what that was -- what level that</p> <p>4 role was scoped for?</p> <p>5 A. Between Level 8 and Level 9.</p> <p>6 Q. Now, at some point after you</p> <p>7 commenced the hiring of technical directors, was</p> <p>8 the job ladder updated to reflect the ladder as it</p> <p>9 existed in OCTO?</p> <p>10 A. Yes. It -- I think it was roughly a</p> <p>11 year to a year and a half into hiring for OCTO.</p> <p>12 Q. So sometime in 2018?</p> <p>13 A. As I recall, yes.</p> <p>14 Q. Okay. Do you have the Box open?</p> <p>15 A. No, it will take me a minute to open.</p> <p>16 Q. Sure. Do you want go ahead and open</p> <p>17 that?</p> <p>18 A. Sure.</p> <p>19 Okay, I have it open.</p> <p>20 Q. And you're going to be looking for</p> <p>21 Tab 72.</p> <p>22 A. I have no items in the folder.</p> <p>23 Q. Okay. Go ahead and try to refresh.</p> <p>24 A. Okay.</p> <p>25</p>
<p style="text-align: right;">Page 35</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 the description of the categories that I've</p> <p>2 described earlier, which is techni -- we wanted to</p> <p>3 hire what we called technical directors for the</p> <p>4 office of the CTO and that job description</p> <p>5 consisted of the three activity types described</p> <p>6 earlier; the customer influence and progress, the</p> <p>7 engineering influence and progress, and the</p> <p>8 evangelism.</p> <p>9</p> <p>10 Q. Do you recall at the time what the</p> <p>11 top level was on the TSC job ladder that you had</p> <p>12 borrowed?</p> <p>13 A. The highest -- at the time, as I</p> <p>14 recall it, the highest codified level that we</p> <p>15 could hire for was a Level 9.</p> <p>16 Q. Do you recall whether the Level 9 had</p> <p>17 its own entry in the job ladder or whether the job</p> <p>18 ladder ended at 8 plus?</p> <p>19 A. Yeah, as I recall there was less</p> <p>20 definition. Once you reached L 8 there was a</p> <p>21 general categorization of leadership on the</p> <p>22 technical solutions consultant ladder, leadership</p> <p>23 meaning 8 plus.</p> <p>24 Q. So there was no separate entry for</p> <p>25 L 8 and L 9?</p>	<p style="text-align: right;">Page 37</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 MR. GAGE: It just appeared for me.</p> <p>2 A. I see it now.</p> <p>3 Q. Okay. We are going to mark this as</p> <p>4 Exhibit 76 and this is the Bates number of</p> <p>5 GOOG-ROWE-00059224 through 229. When I refer to</p> <p>6 Bates numbers, I'm referring to those small</p> <p>7 numbers in the lower right-hand corner.</p> <p>8 (Whereupon, Exhibit 76 was marked at</p> <p>9 this time.)</p> <p>10 Q. Do you recognize this as an e-mail</p> <p>11 string on which some of the string you are a</p> <p>12 recipient?</p> <p>13 A. I'm reading through it now.</p> <p>14 Yes.</p> <p>15 Q. Okay. I would like you to look at</p> <p>16 the page that has the small Bates Number 226.</p> <p>17 MR. GAGE: Is that the third page of</p> <p>18 the PDF?</p> <p>19 MS. GREENE: It is.</p> <p>20 A. Okay, I see that, Page 3.</p> <p>21 Q. Okay, and do you see the entry from</p> <p>22 March 26, 2018 at 8:54 a.m.?</p> <p>23 A. I do.</p> <p>24 Q. And you -- if the writing is small,</p> <p>25</p>

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<p style="text-align: right;">Page 42</p> <p>1 - WILL GRANNIS -</p> <p>2 Q. -- June 1st, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So is this consistent with</p> <p>5 your general recollection about when the TSC</p> <p>6 ladder was updated or revised to reflect how it</p> <p>7 operated in OCTO?</p> <p>8 A. Generally the TSC ladders been</p> <p>9 constantly evolving as all ladders do at Google.</p> <p>10 All ladders are updated on a semi-frequent basis.</p> <p>11 Q. With respect to your prior testimony</p> <p>12 about when a revision of the ladder was made to</p> <p>13 bring it more in alignment with how it operated in</p> <p>14 OCTO, is this -- is this consistent with around</p> <p>15 that time frame you mentioned before?</p> <p>16 A. Yes, it -- there was a constant -- we</p> <p>17 were constantly evolving the TSC ladders as well</p> <p>18 as SWE PM broadly speaking within Google.</p> <p>19 Q. I would like you now to take a look</p> <p>20 at the Box and you're going to be looking for Tab</p> <p>21 175.</p> <p>22 A. Okay, I've got it.</p> <p>23 Q. Actually, you know what, you can put</p> <p>24 that one aside. We're not going to mark that one</p> <p>25 yet.</p>	<p style="text-align: right;">Page 44</p> <p>1 - WILL GRANNIS -</p> <p>2 take a five-minute just bathroom and water</p> <p>3 break and so let's come back at 12:40.</p> <p>4 MR. GAGE: All right.</p> <p>5 THE VIDEOGRAPHER: Going off the</p> <p>6 record at 12:34 p.m. Eastern.</p> <p>7 (Whereupon, there was a brief recess</p> <p>8 in the proceedings.)</p> <p>9 THE VIDEOGRAPHER: We are back on the</p> <p>10 record at 12:42 p.m. Eastern.</p> <p>11 Q. Okay. Mr. Grannis, can you look in</p> <p>12 the Box at Exhibit 61. This document was</p> <p>13 previously marked as Exhibit 61 and has the Bates</p> <p>14 number GOOG-ROWE-00055477 through 479.</p> <p>15 A. Okay, I see it.</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. Yes.</p> <p>18 Q. And what is this?</p> <p>19 A. This is a position description for</p> <p>20 the office of CTO technical director.</p> <p>21 Q. When -- and when you were referring</p> <p>22 to the job description earlier, is this what you</p> <p>23 were referring to?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. This is the external job description,</p>
<p style="text-align: right;">Page 43</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Okay.</p> <p>3 Q. At the time you were hiring into the</p> <p>4 technical director positions, what kinds of</p> <p>5 candidates were you targeting?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. There were two -- I mean, the -- the</p> <p>8 role description is, you know, a really good guide</p> <p>9 to what we were looking for which is people who</p> <p>10 had skills, knowledge, abilities, demonstrated</p> <p>11 acumen across -- you know, the ability to advance</p> <p>12 customers, the ability to influence engineering,</p> <p>13 and the ability to convey very complex ideas</p> <p>14 externally to instigate action. So we were</p> <p>15 looking for the absolute best candidates we could</p> <p>16 find that could do those three things.</p> <p>17 Q. And were you looking to find</p> <p>18 candidates with respect to the certain industries?</p> <p>19 A. That actually wasn't the intention in</p> <p>20 hiring. We really wanted people that could cover</p> <p>21 these three areas and the -- the resultant</p> <p>22 pipeline, being able to communicate complex ideas</p> <p>23 to different organizations yielded a pipeline that</p> <p>24 included both vertical and non-vertical expertise.</p> <p>25 MS. GREENE: Okay. I would like to</p>	<p style="text-align: right;">Page 45</p> <p>1 - WILL GRANNIS -</p> <p>2 yes.</p> <p>3 Q. And so the technical directors that</p> <p>4 you were looking to hire, this was the external</p> <p>5 job description that you -- that you used?</p> <p>6 A. Yes.</p> <p>7 Q. Okay, I would like you now to close</p> <p>8 that out and go to Tab 43. We're going to need</p> <p>9 just a moment to load that in.</p> <p>10 A. Okay.</p> <p>11 MR. GAGE: What tab did you say; what</p> <p>12 was the number you said?</p> <p>13 MS. GREENE: It's going to be 4-3.</p> <p>14 MR. GAGE: Oh, okay.</p> <p>15 Q. I apologize for the delay. Okay,</p> <p>16 should be in if you want to refresh and we're</p> <p>17 going to mark this as Exhibit 78 and it has the</p> <p>18 Bates number GOOG-ROWE-00017356 through 358.</p> <p>19 (Whereupon, Exhibit 78 was marked at</p> <p>20 this time.)</p> <p>21 Q. Do you recognize this document?</p> <p>22 A. Yes.</p> <p>23 Q. And you're copied on this</p> <p>24 correspondence, correct?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 46</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And it's from August 28th of 2017,</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. And this is an e-mail that Melissa</p> <p>5 Lawrence had sent to some recipients. Are those</p> <p>6 recipients people who you recognize as being</p> <p>7 technical directors within OCTO?</p> <p>8 A. At the time they were, yes.</p> <p>9 Q. Okay, and this is with respect to</p> <p>10 preparing for PERF, and does PERF refer to the</p> <p>11 performance review process?</p> <p>12 A. Yes.</p> <p>13 Q. And you see in Melissa's e-mail, she</p> <p>14 says "There is very little documented for L 8 plus</p> <p>15 expectations at Google. For general levelling,</p> <p>16 this is the best guide available for generic</p> <p>17 engineering." Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. And do you know whether that was a</p> <p>20 reference to the Eng level guide, the general Eng</p> <p>21 level guide?</p> <p>22 A. I -- I don't recall.</p> <p>23 Q. Do you recall whether the general</p> <p>24 engineering levelling guide was something that you</p> <p>25</p>	<p style="text-align: right;">Page 48</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Sure. The context in which you've</p> <p>2 reviewed that, is that in relationship to your</p> <p>3 role in OCTO?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Now, if we can go back to what</p> <p>6 we marked as Exhibit 78 and that was Tab 43, do</p> <p>7 you have that document open again?</p> <p>8 A. I have it.</p> <p>9 Q. Okay. So as of August 28, 2017 was</p> <p>10 there a levelling guide specific for the TSC</p> <p>11 ladder as it existed in OCTO?</p> <p>12 A. Not that I recall.</p> <p>13 Q. Okay. You can put that aside.</p> <p>14 Now, in connection with hiring the</p> <p>15 technical directors, were you -- were you provided</p> <p>16 with a levelling guide to assist you in that</p> <p>17 process?</p> <p>18 A. As a -- no.</p> <p>19 Q. Okay. I want you to look now at Tab</p> <p>20 175 and we're going to mark this as Exhibit 79 and</p> <p>21 it has the Bates number GOOG-ROWE-00019205 through</p> <p>22 208.</p> <p>23 (Whereupon, Exhibit 79 was marked at</p> <p>24 this time.)</p> <p>25</p>
<p style="text-align: right;">Page 47</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 reviewed in connection with the performance review</p> <p>2 process?</p> <p>3 A. I don't recall.</p> <p>4 Q. Okay. Why don't you go ahead, we're</p> <p>5 going to look at another document. We're going to</p> <p>6 come back to this. If you can go back to the Box</p> <p>7 and look now at Tab 175.</p> <p>8 A. Okay, I've got it.</p> <p>9 Q. I'm sorry, I keep sending you to that</p> <p>10 document and it's not the right one. I actually</p> <p>11 wanted you to look at Exhibit 6.</p> <p>12 A. Okay.</p> <p>13 Q. This document was previously marked</p> <p>14 as Exhibit 6 and has the Bates number P001584</p> <p>15 through 85. Do you recognize this document?</p> <p>16 A. It appears to be Engineering-Wide</p> <p>17 Levelling Guide for this year's performance</p> <p>18 review.</p> <p>19 Q. Have you seen Engineering-Wide</p> <p>20 Levelling Guides like this in the past?</p> <p>21 A. Yes.</p> <p>22 Q. And have you seen it in connection</p> <p>23 with the technical directors in OCTO?</p> <p>24 A. I don't understand your question.</p> <p>25</p>	<p style="text-align: right;">Page 49</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Do you recognize this document?</p> <p>2 A. No.</p> <p>3 Q. Have you seen any document like this</p> <p>4 before, an "L 8 Assessment-Based Interview</p> <p>5 Questions"?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. Yes, I have seen rubric-based</p> <p>8 interview questions before.</p> <p>9 Q. For L 8 specifically, L 8 plus</p> <p>10 specifically?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Do you recall with respect</p> <p>13 to the hiring of the technical directors in</p> <p>14 2016/early 2017 whether you were given any sort of</p> <p>15 assessment-based interview questions for the L 8</p> <p>16 plus level?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. We -- yes, we utilized a -- a series</p> <p>19 of questions for all candidates, rubric-based</p> <p>20 questions.</p> <p>21 Q. And was it the same rubric-based</p> <p>22 questions for all candidates?</p> <p>23 A. Yes.</p> <p>24 Q. Okay, give me one moment.</p> <p>25</p>

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50 to 53

<p style="text-align: right;">Page 50</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Okay. So the technical directors</p> <p>2 that you were in the process of hiring in late</p> <p>3 2016/early 2017, you expected them to fit within</p> <p>4 that job description, correct?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Are you referring to the job</p> <p>7 description earlier, the external job description?</p> <p>8 Q. Correct.</p> <p>9 A. Yes.</p> <p>10 Q. And they would all have -- were being</p> <p>11 hired for roles that would have the same types of</p> <p>12 job responsibilities, correct?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Yes, the three pillars I referred to</p> <p>15 earlier; the customer advancement, the engineering</p> <p>16 advancement, and the evangelism.</p> <p>17 Q. Okay. So each of the candidates who</p> <p>18 were hired into this role needed to have similar</p> <p>19 skill sets to be able to meet those three pillars,</p> <p>20 correct?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Yes.</p> <p>23 Q. And what was that skill set that</p> <p>24 would be required?</p> <p>25</p>	<p style="text-align: right;">Page 52</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. Yes.</p> <p>2 Q. How do you define Googliness as that</p> <p>3 term is used at Google?</p> <p>4 A. I don't create a separate definition.</p> <p>5 I use the -- what we did for hiring technical</p> <p>6 directors is we look for, you know, proven</p> <p>7 methods to assess Googliness. In this case,</p> <p>8 that's -- you've highlighted here the</p> <p>9 standard-type questions which would be used when</p> <p>10 we interview.</p> <p>11 Q. Okay. I guess I'm asking something</p> <p>12 just a little bit different, which is: When you</p> <p>13 use the term, you know, their "Googliness" or are</p> <p>14 they Googlely as you've heard that used and we've</p> <p>15 had other people testify about this as well,</p> <p>16 what's your understanding of what that means,</p> <p>17 Googliness?</p> <p>18 A. Googliness can comprise a range of</p> <p>19 attributes and again in looking at the -- you</p> <p>20 know, referencing Tab 175 I think it's a good</p> <p>21 example of how it isn't defined by just one</p> <p>22 characteristic, but it can be multiple</p> <p>23 characteristics. So here it shows, you know,</p> <p>24 thriving in ambiguity, caring about a team,</p> <p>25</p>
<p style="text-align: right;">Page 51</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 MR. GAGE: Objection.</p> <p>2 A. Demonstrated ability to understand</p> <p>3 and advance customers usually in the form of the</p> <p>4 experience -- firsthand experiences with Cloud,</p> <p>5 Cloud migration, second engineering experience</p> <p>6 sufficient to demonstrate ability to influence</p> <p>7 engineering groups without authority, and then</p> <p>8 third demonstrated thought leadership or some form</p> <p>9 of evangelism.</p> <p>10 Q. And so as you were interviewing</p> <p>11 candidates, were you evaluating them against that</p> <p>12 skill set as to whether you should hire them?</p> <p>13 A. We were evaluating them against the</p> <p>14 standard rubric which includes four categories,</p> <p>15 three of which are represented on Tab 175 and the</p> <p>16 fourth which is role-related knowledge which is</p> <p>17 the three categories I've described.</p> <p>18 Q. You made a reference to Tab 175, so I</p> <p>19 just wanted to look at that --</p> <p>20 A. Yes.</p> <p>21 Q. -- if you have it open.</p> <p>22 A. Yeah, I -- I still have it open.</p> <p>23 Q. Perfect. So are you referring to the</p> <p>24 categories of leadership, Googliness, and GCA?</p> <p>25</p>	<p style="text-align: right;">Page 53</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 challenge of status quo. There's multiple</p> <p>2 dimensions on which someone can demonstrate</p> <p>3 Googliness.</p> <p>4 Q. Are there other attributes that you</p> <p>5 would put under "Googliness," as you understand</p> <p>6 that term?</p> <p>7 A. I think humility is generally brought</p> <p>8 up.</p> <p>9 Q. Anything else?</p> <p>10 A. I think that's a pretty comprehensive</p> <p>11 list that's on the tab.</p> <p>12 Q. What -- other than the questions that</p> <p>13 you were provided, the rubric questions you were</p> <p>14 provided in the context of interviewing technical</p> <p>15 director candidates, do you -- were you provided</p> <p>16 with any other materials to assist you in that</p> <p>17 interview process?</p> <p>18 A. Yes.</p> <p>19 Q. What?</p> <p>20 A. Typically candidate's resume and any</p> <p>21 relevant background information that they had</p> <p>22 provided to help us prepare for the interview.</p> <p>23 Q. Anything else?</p> <p>24 A. Not that I recall.</p> <p>25</p>

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<p style="text-align: right;">Page 54</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Do you recall whether you reviewed</p> <p>2 any Google policies or operations guides in</p> <p>3 connection with your interview of -- interviews of</p> <p>4 technical director candidates?</p> <p>5</p> <p>6 A. Well, I and all Googlers are required</p> <p>7 to go through training in order to be</p> <p>8 interviewers.</p> <p>9 Q. And what did your training entail?</p> <p>10 A. A knowledge of the four categories I</p> <p>11 described earlier; how to take notes, how to</p> <p>12 utilize the system we call GHire which is the</p> <p>13 system of record for notes from interviews, and</p> <p>14 just general how to create time, space in a</p> <p>15 conversation to make sure there's adequate time</p> <p>16 for a candidate to answer questions and then also</p> <p>17 ask questions at the end.</p> <p>18 Q. Going back again to the 2016/20 --</p> <p>19 early 2017 time frame, had you received training</p> <p>20 with respect to implicit bias?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. I don't recall the training that I</p> <p>23 had four or five, almost six years ago, no.</p> <p>24 Q. Have you since received any training</p> <p>25 on implicit bias?</p>	<p style="text-align: right;">Page 56</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 had experience in verticals and how they might fit</p> <p>2 into the -- the organization that you were</p> <p>3 building.</p> <p>4</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. The primary goal in hiring for</p> <p>7 OCTO was to hire people that could fulfill the</p> <p>8 three -- from a role-related knowledge standpoint,</p> <p>9 the core was the three pillars that I referred to</p> <p>10 earlier that comprised the job requirements in the</p> <p>11 role-related knowledge.</p> <p>12 Q. And so if someone had deep experience</p> <p>13 in a particular vertical, is that something that</p> <p>14 was attractive to you -- to you the same as the</p> <p>15 other qualifications?</p> <p>16 A. Yes.</p> <p>17 Q. Okay, and did you identify candidates</p> <p>18 who had that depth of experience in the vertical</p> <p>19 in the process of interviewing?</p> <p>20 A. Yes.</p> <p>21 Q. And so with respect to -- who would</p> <p>22 be in that category of people who had depth of</p> <p>23 experience in a particular industry vertical?</p> <p>24 MR. GAGE: Objection.</p> <p>25 Q. I'm looking for names.</p>
<p style="text-align: right;">Page 55</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 MR. GAGE: Objection.</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Now, you mentioned the term</p> <p>4 "vertical" earlier. Can you define that term for</p> <p>5 me as -- as you mentioned in the context?</p> <p>6 A. Industries; banking, healthcare,</p> <p>7 retail, media, entertainment, gaming are examples</p> <p>8 not all-inclusive.</p> <p>9 Q. And so as you were going through the</p> <p>10 interview process, did you start to identify</p> <p>11 candidates with background or experience in</p> <p>12 particular verticals?</p> <p>13 A. Yes.</p> <p>14 Q. Okay, and what can you tell me about</p> <p>15 that?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. Is -- is there something more -- I</p> <p>18 don't understand the question. It -- it seems</p> <p>19 very broad.</p> <p>20 Q. Yeah, it is a broad question because</p> <p>21 I want to understand what your thought process</p> <p>22 was --</p> <p>23 A. Okay.</p> <p>24 Q. -- around the hiring of people who</p> <p>25</p>	<p style="text-align: right;">Page 57</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. I've interviewed likely over a</p> <p>2 thousand people since I came to Google.</p> <p>3 Q. Well, so I'll help. Let's focus in</p> <p>4 on people you hired. Amongst the people, the</p> <p>5 candidates that you ended up hiring, which ones of</p> <p>6 those are ones that you would say, you know, these</p> <p>7 were people -- or people who have, you know,</p> <p>8 industry-depth experience --</p> <p>9 A. Are of them.</p> <p>10 Q. -- in a particular industry?</p> <p>11 A. All of them.</p> <p>12 Q. Okay. So all of the candidates in</p> <p>13 addition to fulfilling the four -- three groups</p> <p>14 that you mentioned earlier, also had additional</p> <p>15 experience in a particular industry?</p> <p>16 A. No, I -- please me to clarify. When</p> <p>17 I think of the industry experience, I think of it</p> <p>18 as their ability to fulfill part of Pillar 1 and</p> <p>19 part of Pillar 3. Pillar 1 being the ability to</p> <p>20 influence as subject matter experts a customer.</p> <p>21 So for example if we are trying to</p> <p>22 advance a customer in retail, someone who has a</p> <p>23 retail background will likely be able to speak the</p> <p>24 language of that customer more easily. So it</p> <p>25</p>

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<p style="text-align: right;">Page 58</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 helps them to fulfill Bucket Number 1 or Pillar</p> <p>2 Number 1 of their job and if they're very familiar</p> <p>3 in the retail industry they may be very effective</p> <p>4 in retail industry forums or thought leadership</p> <p>5 seminars or panels or things like that, which</p> <p>6 would help them fulfill Bucket Number 3.</p> <p>7 It always comes back to the -- the</p> <p>8 ability within to execute the job across those</p> <p>9 pillars.</p> <p>10 Q. So in order to be able to execute the</p> <p>11 job for Pillar 1 and for Pillar 3, a candidate</p> <p>12 would need a depth of experience in the industry</p> <p>13 that they would be targeting in Pillars 1 and</p> <p>14 Pillars 3; is that a fair summary?</p> <p>15 A. Yes.</p> <p>16 Q. So with respect to the hiring</p> <p>17 process, at what point did you make a</p> <p>18 determination as to what level a particular</p> <p>19 candidate should join Google in?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. To clarify, I didn't make level</p> <p>22 determinations.</p> <p>23 Q. Did you make leveling --</p> <p>24 A. I --</p>	<p style="text-align: right;">Page 60</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 the interviews for all of the candidates?</p> <p>2 A. All of the interviews for a</p> <p>3 candidate.</p> <p>4 Q. Okay, and what steps did you take in</p> <p>5 connection with making a recommendation as to what</p> <p>6 level a candidate should come in at?</p> <p>7 A. The degree to which they demonstrated</p> <p>8 experience, background, acumen across the core</p> <p>9 elements of the role, the role-related knowledge</p> <p>10 as well as the -- the three other categories;</p> <p>11 Googliness, GCA, and leadership.</p> <p>12 Q. Did you consider anything beyond what</p> <p>13 you've just described?</p> <p>14 A. No.</p> <p>15 Q. And what did you do, if anything, to</p> <p>16 document your thought process with respect to</p> <p>17 that?</p> <p>18 A. We used a system called GHire and all</p> <p>19 of my notes and recommendations are in GHire.</p> <p>20 Q. Outside of GHire, did you do anything</p> <p>21 else to document your thought process?</p> <p>22 A. Not that I recall.</p> <p>23 Q. And once you made a recommend-- well,</p> <p>24 let me back up. To whom were you making a</p> <p>25</p>
<p style="text-align: right;">Page 59</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. I'll let you finish.</p> <p>2 A. I -- I was just saying I don't make</p> <p>3 level determinations, but as part of the process</p> <p>4 my job was to ensure that they were -- they were</p> <p>5 qualified at the L 8 plus level, that -- their</p> <p>6 demonstrated experience, you know, I gave a</p> <p>7 recommendation along those lines.</p> <p>8 Q. Okay. So --</p> <p>9 A. We -- we call it a statement of</p> <p>10 support.</p> <p>11 Q. So assuming someone met the L 8 plus</p> <p>12 qualifications, what was your role in deciding</p> <p>13 whether they were -- or determining whether they</p> <p>14 would come in as an L 8, an L 9, or something</p> <p>15 else?</p> <p>16 A. I didn't have a role in determining.</p> <p>17 Q. Did you make a recommendation?</p> <p>18 A. Yes.</p> <p>19 Q. And at what stage did you make a</p> <p>20 recommendation?</p> <p>21 A. Once all of the interviews were</p> <p>22 complete.</p> <p>23 Q. And by that, do you mean all of the</p> <p>24 interviews for a particular candidate or all of</p> <p>25</p>	<p style="text-align: right;">Page 61</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 recommendation?</p> <p>2 A. There are as I understand it two</p> <p>3 forms of review, hiring committee and then a final</p> <p>4 review; and so I was making a recommendation that</p> <p>5 would pair with recruiting's recommendation for</p> <p>6 those two sets of reviews.</p> <p>7 Q. And who made the final decision with</p> <p>8 respect to at what level a candidate would be</p> <p>9 hired?</p> <p>10 A. I don't know if -- I didn't always</p> <p>11 know. I didn't know. The review process is a</p> <p>12 closed process. I didn't know who was in that</p> <p>13 meeting.</p> <p>14 Q. Are you aware of any instances where</p> <p>15 you recommended someone to be hired as a Level 8</p> <p>16 and the ultimate determination was that they would</p> <p>17 be hired as a Level 9?</p> <p>18 A. I don't recall.</p> <p>19 Q. Are you aware of any instances where</p> <p>20 you recommended that someone be hired as a Level 9</p> <p>21 and instead they were hired as a Level 8?</p> <p>22 A. Sorry, I'm just thinking.</p> <p>23 Q. Of course.</p> <p>24 A. I -- I don't recall off the top of my</p> <p>25</p>

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<p style="text-align: right;">Page 62</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 head.</p> <p>2</p> <p>3 Q. Are you -- do you recall any</p> <p>4 circumstances where you were requir -- or you</p> <p>5 were asked to provide additional document --</p> <p>6 documentation or information supporting your</p> <p>7 recommendation?</p> <p>8 A. No, I only recall the statement of</p> <p>9 support.</p> <p>10 Q. Now, at the time you were hiring</p> <p>11 these individuals into the role it was early on in</p> <p>12 building out the function, correct?</p> <p>13 A. Which individuals are you referring</p> <p>14 to?</p> <p>15 Q. The technical directors that you</p> <p>16 hired in late 2016/early 2017.</p> <p>17 A. Yes, that period of time was the</p> <p>18 beginning of the team, yup.</p> <p>19 Q. And at that time you didn't have a</p> <p>20 super strong sense of what distinguishes an 8 from</p> <p>21 a 9, correct?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. At what point in time are you</p> <p>24 referring to?</p> <p>25 Q. The late 2016/early2017 time frame.</p>	<p style="text-align: right;">Page 64</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 but I could be mistaken.</p> <p>2</p> <p>3 Q. Well, my question is: Are you</p> <p>4 including him in this group of the first five to</p> <p>5 eight you hired; was he one of the first let's say</p> <p>6 eight, up to eight; was he one of the first eight</p> <p>7 you hired?</p> <p>8 MR. GAGE: Objection, asked and</p> <p>9 answered.</p> <p>10 Q. You can answer.</p> <p>11 A. I -- I don't know.</p> <p>12 Q. Okay.</p> <p>13 A. I -- I would have to see the actual</p> <p>14 dates of hire to be able to verify and I don't</p> <p>15 have that in front of me.</p> <p>16 Q. What about Ben Wilson; do you recall</p> <p>17 whether he was one of the first eight you hired?</p> <p>18 A. Again, we hired a lot of people in a</p> <p>19 short period of time. I'd really need to see a</p> <p>20 timing sequence.</p> <p>21 Q. Okay. At the time though that you</p> <p>22 were hiring in -- in late 2016/early2017, you</p> <p>23 didn't have a great super-calibrated reference</p> <p>24 frame with respect to levelling in that technical</p> <p>25 director position, correct?</p>
<p style="text-align: right;">Page 63</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1</p> <p>2 A. Well, the time frame matters a lot</p> <p>3 because in the beginning -- you know, in 2016 when</p> <p>4 we first started the team, I would -- I would</p> <p>5 assess the first five to, you know, eight people</p> <p>6 that were in the team, we had a little bit less of</p> <p>7 a sense; and then as we hired more and more,</p> <p>8 that -- the pattern clearly emerged.</p> <p>9 Q. Who were the first five to eight</p> <p>10 people you're referring to?</p> <p>11 A. The first five -- roughly five, six</p> <p>12 that we hired in 2016, so within two months of</p> <p>13 starting the meeting I referred to earlier where</p> <p>14 we decided that we were going to try to -- we had</p> <p>15 a number of -- we had the beginning of external</p> <p>16 hires and we had internal transfers as well.</p> <p>17 Q. And so what are the names of those</p> <p>18 five to eight individuals, do you recall?</p> <p>19 A. Oh, I don't recall the names off the</p> <p>20 top of my head, but I -- I -- is there -- if</p> <p>21 there's a reference or something. I can validate?</p> <p>22 Q. Well, let me ask you -- I'll just</p> <p>23 give you some names and you tell me whether you're</p> <p>24 including them in this group. Nicholas Harteau?</p> <p>25 A. I don't think he was hired in 2016,</p>	<p style="text-align: right;">Page 65</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1</p> <p>2 MR. GAGE: Objection, asked and</p> <p>3 answered.</p> <p>4 A. We -- we definitely learned over the</p> <p>5 period of that time and even over the period of</p> <p>6 the last four or five years, you know, we've -- we</p> <p>7 are always going to get better at how we're able</p> <p>8 to assess just based on volume.</p> <p>9 Q. At that time you didn't have any</p> <p>10 preconceived notions about levelling, correct?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. Well, we knew -- we knew it would be</p> <p>13 8 -- 8s and 9s primarily, just because of the</p> <p>14 requirements of the experience that's required to</p> <p>15 perform across those three pillars.</p> <p>16 Q. So what did you do to figure out</p> <p>17 whether someone would be coming in as a Level 8 or</p> <p>18 a Level 9?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. We interviewed them.</p> <p>21 Q. Anything beyond what you've already</p> <p>22 described?</p> <p>23 A. No.</p> <p>24 Q. So what was your basis for</p> <p>25 recommending Ms. Rowe as a level 8?</p>

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66 to 69

<p style="text-align: right;">Page 66</p> <p>1 - WILL GRANNIS -</p> <p>2 A. I'd have to see the interview packet.</p> <p>3 Q. Okay. We're going to go back to the</p> <p>4 Box.</p> <p>5 A. Okay.</p> <p>6 Q. I think I can get that up for you.</p> <p>7 So we're going to be looking for Exhibit 59.</p> <p>8 MR. GAGE: Is this already in the Box</p> <p>9 or being placed there now?</p> <p>10 MS. GREENE: It's in there.</p> <p>11 MR. GAGE: 59?</p> <p>12 MS. GREENE: Correct.</p> <p>13 MR. GAGE: Let me refresh it. It</p> <p>14 wasn't there.</p> <p>15 A. Is this Exhibit 59?</p> <p>16 Q. Correct.</p> <p>17 A. Okay.</p> <p>18 MS. GREENE: Ken, I think there must</p> <p>19 be a lag on your end. I apologize for that.</p> <p>20 We'll make sure to give you plenty of time.</p> <p>21 MR. GAGE: I think it's intentional,</p> <p>22 Cara. I think you're doing this on purpose.</p> <p>23 I don't know how, but I'm going to figure it</p> <p>24 out.</p> <p>25 (Laughing.)</p>	<p style="text-align: right;">Page 68</p> <p>1 - WILL GRANNIS -</p> <p>2 don't -- I'm looking for the date of this packet.</p> <p>3 Q. Sure. Well, I can say that if you</p> <p>4 look at the end the NDA associated with it was</p> <p>5 signed on November 14th of 2016, if that helps</p> <p>6 place it in time.</p> <p>7 A. Yeah, so it appears to be roughly the</p> <p>8 same time.</p> <p>9 Q. Okay. Now, I think the question</p> <p>10 I had asked you was what was your basis for</p> <p>11 recommending Ms. Rowe as a Level 8?</p> <p>12 So if you want to flip through this</p> <p>13 document and see if it refreshes your</p> <p>14 recollection, and then that's the question I'll be</p> <p>15 asking you.</p> <p>16 A. Okay. Can I have a couple of minutes</p> <p>17 to read?</p> <p>18 Q. Yes, please take your time.</p> <p>19 A. Okay.</p> <p>20 Q. So the question is, what was the</p> <p>21 basis for your recommendation that she be hired as</p> <p>22 a Level 8?</p> <p>23 A. After reviewing this packet and again</p> <p>24 trying to, you know, work backwards in time, a</p> <p>25 couple of things stand out.</p>
<p style="text-align: right;">Page 67</p> <p>1 - WILL GRANNIS -</p> <p>2 All right, I have it now.</p> <p>3 Q. Okay. We're looking at what's been</p> <p>4 previously marked as Exhibit 59, Bates stamped</p> <p>5 GOOG-ROWE-00019097 through 146.</p> <p>6 So do you recognize this as Ms.</p> <p>7 Rowe's GHire packet?</p> <p>8 A. It appears to be, yes.</p> <p>9 Q. Okay, and first I want to direct your</p> <p>10 attention to the top of this document, the first</p> <p>11 page.</p> <p>12 It says "This candidate is an L 8</p> <p>13 Principal Technical Solutions Consultant for the</p> <p>14 Office of the CTO." Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. And then underneath it mentions two</p> <p>17 other people, Evren and Scott. Were those two</p> <p>18 individuals who had -- that were being hired</p> <p>19 around the same time?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. There's no date -- I'm looking for a</p> <p>22 date on this artifact in order to determine how</p> <p>23 close it is to the timing.</p> <p>24 For example Evren was in late</p> <p>25 October, Scott was in December. I don't -- and I</p>	<p style="text-align: right;">Page 69</p> <p>1 - WILL GRANNIS -</p> <p>2 On the -- on the pros, clear industry</p> <p>3 knowledge, ability to tie use cases which is a</p> <p>4 term for, you know, specific type of problem in</p> <p>5 engineering that needs to be solved and the</p> <p>6 ability to put that in context in the industry in</p> <p>7 which she was -- had the most experience, which</p> <p>8 was financial services; and strong communicator</p> <p>9 which would likely indicate strong communication</p> <p>10 skills and strong ability to convey complex ideas</p> <p>11 to customers.</p> <p>12 On the con side, some flags around</p> <p>13 depth of experience, around technical ability and</p> <p>14 no clear demonstrated large-scale migration to</p> <p>15 Cloud, although, it started some preliminary</p> <p>16 activities at JPMorgan.</p> <p>17 So those were all factors I would</p> <p>18 have considered in the levelling recommendation.</p> <p>19 Q. If you can look at the page that</p> <p>20 Bates stamped 137, the last three numbers 1-3-7.</p> <p>21 MR. GAGE: What -- what page in the</p> <p>22 PDF is it, Cara?</p> <p>23 MS. GREENE: 41 I believe.</p> <p>24 MR. GAGE: Thank you. It's just</p> <p>25 easier to identify that way.</p>

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70 to 73

<p style="text-align: right;">Page 70</p> <p>1 - WILL GRANNIS -</p> <p>2 MS. GREENE: Sure.</p> <p>3 A. 130 -- 19137?</p> <p>4 Q. Yes. The page says "Review Our</p> <p>5 Feedback"?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Okay. Do you see the entry at 12:38</p> <p>8 p.m. on November 8th from yourself?</p> <p>9 A. I do.</p> <p>10 Q. And other than what is here, did you,</p> <p>11 anywhere else, self-document anything with</p> <p>12 relationship to why you were recommending a Level</p> <p>13 8?</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you consider, at any</p> <p>16 point, a Level 9 for her?</p> <p>17 A. Hard -- hard to recall four years ago</p> <p>18 what my -- you know -- what I may have been</p> <p>19 considering or not.</p> <p>20 Q. So you don't remember sitting here</p> <p>21 today?</p> <p>22 A. I don't.</p> <p>23 Q. Do you recall any candidates who you</p> <p>24 hired as a Level 9 who had items in their con</p> <p>25 list?</p>	<p style="text-align: right;">Page 72</p> <p>1 - WILL GRANNIS -</p> <p>2 Do you know whether your own years of experience</p> <p>3 was something that Google considered in terms of</p> <p>4 your levelling?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I do not know what anyone considered</p> <p>7 in my hiring process. They -- they didn't give me</p> <p>8 my results except to hire me.</p> <p>9 Q. So you didn't have an understanding</p> <p>10 then that your years of experience was a factor</p> <p>11 that was considered in your level, correct?</p> <p>12 MR. GAGE: Objection, asked and</p> <p>13 answered.</p> <p>14 A. I -- I -- I don't know because I</p> <p>15 wasn't the one hiring me.</p> <p>16 Q. Okay. Were you, in connection with</p> <p>17 the hiring of the candidates, provided with any</p> <p>18 sort of metrics that equated years of experience</p> <p>19 to a particular level?</p> <p>20 A. No.</p> <p>21 Q. Okay, give me just a second. I'm</p> <p>22 going to pull up a document I hadn't planned to</p> <p>23 use, but I think it will make it easier.</p> <p>24 A. Okay.</p> <p>25 Q. Okay. We're in the process of adding</p>
<p style="text-align: right;">Page 71</p> <p>1 - WILL GRANNIS -</p> <p>2 A. Who had -- what was the last thing?</p> <p>3 Q. With respect to candidates where you</p> <p>4 recommended a Level 9, do you recall whether any</p> <p>5 of them had items in -- you -- you did a pro and</p> <p>6 con list. I'm asking any of them have items in a</p> <p>7 con list, in the con column?</p> <p>8 A. Well, I've never interviewed --</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. I've never interviewed anyone that</p> <p>11 was perfect.</p> <p>12 Q. Do you recall any Level 9 candidates</p> <p>13 you hired with particularity with respect to what</p> <p>14 their cons were?</p> <p>15 A. Again, I'd have to review the -- I'd</p> <p>16 have to review the packet.</p> <p>17 Q. With respect to the hiring of the</p> <p>18 techni -- technical directors in late</p> <p>19 2016/early2017, were you considering any of the</p> <p>20 candidates against each other with respect to</p> <p>21 levelling recommendations?</p> <p>22 A. No, it was -- I was comparing each</p> <p>23 individual to their performance and their</p> <p>24 interviews and their ability to do the job.</p> <p>25 Q. As of -- well, let me ask you this:</p>	<p style="text-align: right;">Page 73</p> <p>1 - WILL GRANNIS -</p> <p>2 Exhibit 2, so give it a moment to load and then</p> <p>3 you can refresh and pull that up.</p> <p>4 A. Exhibit 2?</p> <p>5 Q. Yes.</p> <p>6 A. Okay, I can see it.</p> <p>7 MS. GREENE: How about you, Ken?</p> <p>8 MR. GAGE: Not yet.</p> <p>9 Okay, I've got it.</p> <p>10 Q. Okay. You're looking at a copy of</p> <p>11 what's been previously marked as Exhibit 2 with</p> <p>12 the title "Level 8 and Level 9 Employees in Eng PM</p> <p>13 Ops" and it is a 27-page document.</p> <p>14 So I will first direct your attention</p> <p>15 to Page 3 of this document.</p> <p>16 A. Okay. I'm there.</p> <p>17 Q. And if you look at the entries for</p> <p>18 120 to 124, do you recognize those names?</p> <p>19 A. Yes.</p> <p>20 Q. And are those individuals who were</p> <p>21 hired as directors, technical directors into OCTO?</p> <p>22 A. Yes.</p> <p>23 Q. And these five individuals were hired</p> <p>24 as Level 9, correct?</p> <p>25 A. Yes.</p>

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74 to 77

<p style="text-align: right;">Page 74</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And did you recommend that each of</p> <p>2 these individuals be hired as a Level 9?</p> <p>3 A. I'd have to see my recommendations.</p> <p>4 Q. Okay. Do you recall whether any of</p> <p>5 the individuals requested that they be hired as a</p> <p>6 Level 9?</p> <p>7 A. I don't recall that.</p> <p>8 Q. Do you recall having a conversation</p> <p>9 with Ms. Rowe about what level she would be</p> <p>10 joining as?</p> <p>11 A. No.</p> <p>12 Q. Do you recall her asking whether</p> <p>13 Level 8 was the right level for her?</p> <p>14 A. No. What I recall, her concerns were</p> <p>15 in other areas.</p> <p>16 Q. Do you recall conversations around</p> <p>17 whether or not she would be an L 8 or -- or</p> <p>18 higher?</p> <p>19 A. I don't -- I don't recall this.</p> <p>20 Q. Do you recall telling her that</p> <p>21 everyone was coming into the same role?</p> <p>22 A. I don't recall, but that is</p> <p>23 definitely true that everyone was being hired for</p> <p>24 the same role, technical directors solutions</p> <p>25</p>	<p style="text-align: right;">Page 76</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 believe another document. It's going to take a</p> <p>2 minute.</p> <p>3 A. Okay.</p> <p>4 MR. GAGE: Should I refresh now or</p> <p>5 should I wait?</p> <p>6 MS. GREENE: No, I'll tell you when</p> <p>7 to refresh.</p> <p>8 MR. GAGE: Okay.</p> <p>9 MS. GREENE: That's okay.</p> <p>10 Q. Well, you know what, we'll come back</p> <p>11 to that in a minute. I'll ask something else</p> <p>12 while we're waiting for that.</p> <p>13 At the time you were -- let me ask</p> <p>14 you this: How many times did you speak with Ms.</p> <p>15 Rowe in connection with the hiring process?</p> <p>16 A. I don't recall exactly how many</p> <p>17 times, but certainly at least a couple, at least a</p> <p>18 few.</p> <p>19 Q. And do you recall in any of those</p> <p>20 discussions discussing the potential</p> <p>21 verticalization of financial services?</p> <p>22 A. What do you mean by</p> <p>23 "verticalization"?</p> <p>24 Q. Is that a term that you've heard used</p> <p>25</p>
<p style="text-align: right;">Page 75</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 consultant.</p> <p>2 Q. Do you recall telling her whether</p> <p>3 everyone was coming in at the same level?</p> <p>4 A. I don't recall saying that, no,</p> <p>5 because it wasn't true during her hiring process.</p> <p>6 I think we had already hired or were hiring,</p> <p>7 looking at hiring Evren I believe at L 9.</p> <p>8 Q. Did you -- do you recall whether you</p> <p>9 told her that some were coming in as Level 8 and</p> <p>10 some were coming in as Level 9?</p> <p>11 A. I don't recall --</p> <p>12 MR. GAGE: Objection.</p> <p>13 Go ahead.</p> <p>14 A. I don't recall having a levelling</p> <p>15 conversation with Ulku during the hiring process.</p> <p>16 Q. Okay. So, I apologize, I'm still</p> <p>17 going to ask the questions and it's fine if you</p> <p>18 don't remember.</p> <p>19 A. Okay.</p> <p>20 Q. Do you recall telling her that anyone</p> <p>21 was being hired as a Level 9?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No.</p> <p>24 Q. Okay. We're going to add in I</p> <p>25</p>	<p style="text-align: right;">Page 77</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 at Google?</p> <p>2 A. I mean. Some -- some derivatives,</p> <p>3 you know, like creating vertical businesses or</p> <p>4 creating, you know, vertical structures, go-to</p> <p>5 market, things like that, I've heard it. I've</p> <p>6 heard similar things used in that context.</p> <p>7 Q. Did you discuss with Ms. Rowe the</p> <p>8 concept of the financial services vertical at some</p> <p>9 point in the future?</p> <p>10 A. I'm just thinking back. One of the</p> <p>11 areas she was interested in was potential Google</p> <p>12 commitment towards financial services and industry</p> <p>13 based on her strong background in that industry.</p> <p>14 Q. Do you recall discussing whether at</p> <p>15 some point in the future Google might stand up a</p> <p>16 vertical for financial services?</p> <p>17 A. That was certainly a topic that she</p> <p>18 and I discussed. When we discussed it, I don't</p> <p>19 recall the exact timing of it.</p> <p>20 Q. Do you recall telling her that when</p> <p>21 Google did stand up verticals, you believed she</p> <p>22 had a lot of qualifications to compete for the</p> <p>23 head of that vertical?</p> <p>24 A. The -- the nature of that comment</p> <p>25</p>

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90 to 93

<p style="text-align: right;">Page 90</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Now, did there come a point in time</p> <p>2 when you considered having Ms. Rowe oversee the</p> <p>3 other technical directors with -- with vertical</p> <p>4 specialty in OCTO?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Sorry, I'm just thinking back. Well,</p> <p>7 as part of professional development for all of our</p> <p>8 OCTOs, I am always thinking about their potential</p> <p>9 to be managers.</p> <p>10 Q. Okay. We're going to look at Tab 42.</p> <p>11 MR. GAGE: Is this newly added?</p> <p>12 MS. GREENE: Yes. We'll give it a</p> <p>13 minute.</p> <p>14 MR. GAGE: Does that mean it's been</p> <p>15 placed there or is going to be placed there?</p> <p>16 MS. GREENE: It's in the -- it's in</p> <p>17 the process of being placed.</p> <p>18 MR. GAGE: Okay.</p> <p>19 A. Tab 42?</p> <p>20 Q. It should be in there now, yes.</p> <p>21 A. Okay, I got it.</p> <p>22 Q. Okay. We're going to mark this as</p> <p>23 Exhibit 80 and it has the Bates number</p> <p>24 GOOG-ROWE-00058796 through 99.</p> <p>25</p>	<p style="text-align: right;">Page 92</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 team.</p> <p>2 Q. Okay. So then if you look at the</p> <p>3 chart, does this outline groups that were being</p> <p>4 discussed?</p> <p>5 A. Yes, that -- that looks like one of</p> <p>6 the options that we had drawn up.</p> <p>7 Q. And one of the -- of the options</p> <p>8 was -- had verticals as a group, correct?</p> <p>9 A. Yes.</p> <p>10 Q. And what -- what was verticals; what</p> <p>11 was that referring to?</p> <p>12 A. Industries.</p> <p>13 Q. And so these are individuals focusing</p> <p>14 on a particular industry; is that right?</p> <p>15 A. These are individuals who over the</p> <p>16 course of their time in OCTO had really</p> <p>17 demonstrated, you know, a high acumen for a</p> <p>18 particular industry.</p> <p>19 So for example Ben Wilson, energy;</p> <p>20 Jim Bennett, manufacturing; Jeff Kember, media.</p> <p>21 Q. Was Ms. Rowe in that category with</p> <p>22 respect to financial services?</p> <p>23 A. Yes.</p> <p>24 Q. And so would this proposal,</p> <p>25</p>
<p style="text-align: right;">Page 91</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 (Whereupon, Exhibit 80 was marked at</p> <p>2 this time.)</p> <p>3 Q. Just take a minute and read through</p> <p>4 this.</p> <p>5 A. Uh-huh.</p> <p>6 Okay.</p> <p>7 Q. Do you recall in the August,</p> <p>8 20 -- 2017 time frame conversations about</p> <p>9 reorganizing OCTO?</p> <p>10 A. I do recall a conversation around</p> <p>11 span sometime around that time where I described</p> <p>12 the -- the situation where we had I think -- I</p> <p>13 don't recall how many people we had, but a</p> <p>14 significant amount of span direct reports and we</p> <p>15 were looking at smart -- we were trying to think</p> <p>16 about smart ways to organize the team.</p> <p>17 Q. Okay, because you had too many direct</p> <p>18 reports in part?</p> <p>19 A. Because we had too -- yeah, because</p> <p>20 we had too many direct reports and I had too many</p> <p>21 direct reports and we were looking at ways to make</p> <p>22 sure that we were covering these topics and that</p> <p>23 we were set up in a sustainable way because we</p> <p>24 were about to see a large amount of growth in the</p> <p>25</p>	<p style="text-align: right;">Page 93</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 that -- that I think it's Melissa Lawrence is</p> <p>2 sharing, have Ms. Rowe as the leader of that</p> <p>3 vertical group?</p> <p>4 A. Yes.</p> <p>5 Q. Okay, and if you could go back up to</p> <p>6 the first group now -- the first page, I'm sorry,</p> <p>7 and look at the fourth paragraph where it starts</p> <p>8 with "We would like to."</p> <p>9 A. Okay.</p> <p>10 Q. And the last sentence there is,</p> <p>11 "There is one level inversion in the verticals</p> <p>12 group with Ulku Rowe leading the group at a L 8</p> <p>13 and Ben Wilson at a L 9, but we all feel that she</p> <p>14 is the best person for the role." Do you see</p> <p>15 that?</p> <p>16 A. I do.</p> <p>17 Q. And, first of all, what do you</p> <p>18 understand the term "inversion" to refer to?</p> <p>19 A. Inversion is a term we use when a</p> <p>20 manager is at a lower level than their direct</p> <p>21 reports.</p> <p>22 Q. Okay. Was this a true statement,</p> <p>23 that "we all feel that she is the best person for</p> <p>24 the role"?</p> <p>25</p>

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114 to 117

<p style="text-align: right;">Page 114</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. And we're going to mark this as</p> <p>2 Exhibit 87, Bates stamped GOOG-ROWE-00060436</p> <p>3 through 437.</p> <p>4 (Whereupon, Exhibit 87 was marked for</p> <p>5 identification.)</p> <p>6 Q. And if you can look at the bottom</p> <p>7 portion of that first page --</p> <p>8 A. Okay.</p> <p>9 Q. -- does this reflect a ladder</p> <p>10 transf -- a section around a ladder transfer for</p> <p>11 Nick Harteau from the director -- the technical</p> <p>12 director role to an SWE manager ladder?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Oh, I didn't write this e-mail and I</p> <p>15 wasn't on copy, so I don't know exactly what it's</p> <p>16 in reference -- what it refers to --</p> <p>17 Q. Well --</p> <p>18 A. -- but it seems the words are</p> <p>19 describing transfer action.</p> <p>20 Q. Okay, and is this the transfer action</p> <p>21 that you were aware of with respect to Mr.</p> <p>22 Harteau?</p> <p>23 A. Yes, this appears to be the same</p> <p>24 transfer.</p> <p>25</p>	<p style="text-align: right;">Page 116</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 engineering ladder, customer and evangelism aren't</p> <p>2 present in the pillar requirements.</p> <p>3 So the skills that are transferable</p> <p>4 are engineering, but that ladder doesn't recognize</p> <p>5 the skills of large-customer advancement and</p> <p>6 evangelism as val -- as core valuable pieces of</p> <p>7 their job description.</p> <p>8 Q. Are there aspects of the skills that</p> <p>9 someone would have with respect to Pillars 1 and 3</p> <p>10 in TSC that would be skills that could also be</p> <p>11 used with respect to a manager in SWE?</p> <p>12 A. The three OCTO pillars, the first and</p> <p>13 third pillars would be largely negligible to</p> <p>14 transfer to a SWE manager.</p> <p>15 Q. Understood. The pillars describe the</p> <p>16 responsibilities of the TSC, is that a fair way to</p> <p>17 characterize that?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Responsibilities, skills, background,</p> <p>20 experience necessary, yes.</p> <p>21 Q. Okay. So, for instance, thought</p> <p>22 leadership might be a skill that's relevant to the</p> <p>23 first and third pillars, correct?</p> <p>24 MR. GAGE: Objection.</p> <p>25</p>
<p style="text-align: right;">Page 115</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. What was the context of that</p> <p>2 transfer; why was he being transferred?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. He wanted to lead a production</p> <p>5 engineering team, something we don't do in OCTO.</p> <p>6 Q. So he was being transferred from the</p> <p>7 technical director Eng role into an SWE Eng role?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. I'm -- I'm just reading this again</p> <p>10 just cause I -- I've never seen this before.</p> <p>11 Yes, TSE to SWE manager.</p> <p>12 Q. And did you support this transfer?</p> <p>13 A. Yes.</p> <p>14 Q. And did you view his skills in TSC as</p> <p>15 transferrable to SWE?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. Some of them.</p> <p>18 Q. And what skills are transferable?</p> <p>19 A. It's more about the -- it's more</p> <p>20 about the job family, and let me explain. The job</p> <p>21 family -- technical solutions consultant, we</p> <p>22 described earlier the three pillars of this role.</p> <p>23 The pillars are customer, evangelism, and</p> <p>24 engineering. In the SWE ladder, software</p> <p>25</p>	<p style="text-align: right;">Page 117</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. Mostly -- mostly the third, but</p> <p>2 one -- somewhat in the first, yes.</p> <p>3 Q. Okay. Do you see thought</p> <p>4 leadership and evangelism as interchangeable or as</p> <p>5 different -- different things?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. They are slightly different skills.</p> <p>8 Thought leadership is the ability to take a</p> <p>9 situation, use experience, knowledge, what you</p> <p>10 learn and be able to advance a -- a situation or</p> <p>11 an area that quite often others don't believe or</p> <p>12 don't agree with. Evangelism is purely the act of</p> <p>13 communicating externally on behalf of something.</p> <p>14 Q. Okay. We looked earlier at that</p> <p>15 engineering levelling guide --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- do you recall that?</p> <p>18 A. I do.</p> <p>19 Q. With -- with respect to the items</p> <p>20 that were contained on the engineering levelling</p> <p>21 guide, and if you need to we can go back to that</p> <p>22 document, but is it your understanding that those</p> <p>23 items are items that apply both to TSCs and to</p> <p>24 SWES?</p> <p>25</p>

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118 to 121

<p style="text-align: right;">Page 118</p> <p>1 - WILL GRANNIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Somewhat, but that's also why we have</p> <p>4 job families that are more descriptive in terms of</p> <p>5 requirements.</p> <p>6 Q. I want to make sure I'm directing</p> <p>7 you, give me one moment. Okay, let's go back and</p> <p>8 look at that. It's Exhibit 6.</p> <p>9 A. Okay.</p> <p>10 MR. GAGE: Is this already there</p> <p>11 or --</p> <p>12 MS. GREENE: It's there.</p> <p>13 MR. GAGE: Exhibit 6, Adam Lief, this</p> <p>14 one?</p> <p>15 MS. GREENE: Yes.</p> <p>16 A. I have it up.</p> <p>17 Q. Okay. If we can look at the</p> <p>18 last -- Page 2, the entries for Level 8 and Level</p> <p>19 9, are there any entries there that you would say</p> <p>20 do not apply to technical directors?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. And was the question are there any</p> <p>23 that don't explicitly apply?</p> <p>24 Q. That you would say well, this isn't</p> <p>25 relevant with respect to the TSC ladder or roles.</p>	<p style="text-align: right;">Page 120</p> <p>1 - WILL GRANNIS -</p> <p>2 9 in SWE?</p> <p>3 MR. GAGE: Objection. Someone in</p> <p>4 particular?</p> <p>5 MS. GREENE: No, I asked about the</p> <p>6 role.</p> <p>7 MR. GAGE: Oh, you used the word</p> <p>8 "someone," that's why I -- I asked the</p> <p>9 question.</p> <p>10 Q. The attributes of someone in that</p> <p>11 role.</p> <p>12 A. In the SWE manager role?</p> <p>13 Q. Correct, at a Level 8 or 9.</p> <p>14 A. I think generally speaking, you know,</p> <p>15 we would expect to see things like this at those</p> <p>16 levels.</p> <p>17 Q. Okay. You can put that aside.</p> <p>18 A. Okay.</p> <p>19 Q. Do you know who Ben Wilson is?</p> <p>20 A. I do.</p> <p>21 Q. And he's also -- his full name is I</p> <p>22 think Benjamin Wilson; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay, and he -- is he someone also</p> <p>25 whom you hired into the technical director in</p>
<p style="text-align: right;">Page 119</p> <p>1 - WILL GRANNIS -</p> <p>2 A. None that immediately jump out as</p> <p>3 defined.</p> <p>4 Q. Okay, and with respect to a SWE, are</p> <p>5 there any here that you would say as far as you</p> <p>6 understand the role of SWE do not apply to SWE?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. In the category of leadership, I</p> <p>9 think that these would -- these would apply.</p> <p>10 Q. Okay. Well, just so I'm clear: If we</p> <p>11 go all the way back up to Page 1, there's four</p> <p>12 levelling criteria; knowledge and experience,</p> <p>13 complexity and scope, leadership and influence,</p> <p>14 and organizational impact. Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. Okay. So with respect to Levels 8</p> <p>17 and 9, do each of those categories in this</p> <p>18 document apply to SWE?</p> <p>19 A. Well, it says just up in the header</p> <p>20 "It's not a representation of expectations for any</p> <p>21 specific ladder," so I think the answer is no.</p> <p>22 Q. So I'm asking you based on what you</p> <p>23 know about the SWE role and as you've observed it</p> <p>24 in operation, do these generally describe</p> <p>25 attributes of someone at the Level 8 and/or Level</p>	<p style="text-align: right;">Page 121</p> <p>1 - WILL GRANNIS -</p> <p>2 OCTO?</p> <p>3 A. Yes.</p> <p>4 Q. Do you know who Jonathan Donaldson</p> <p>5 is?</p> <p>6 A. Yes.</p> <p>7 Q. Is he another person who you hired</p> <p>8 into the technical director position in OCTO, that</p> <p>9 position we saw in the job description we looked</p> <p>10 at earlier?</p> <p>11 A. Yes.</p> <p>12 Q. What about Paul Strong, do you know</p> <p>13 who he is?</p> <p>14 A. Yes.</p> <p>15 Q. Is he someone else you hired as a</p> <p>16 technical director within OCTO?</p> <p>17 A. Yes.</p> <p>18 Q. And I -- I still have not figured out</p> <p>19 how to say his name, Evren Eryurek?</p> <p>20 A. Eryurek.</p> <p>21 Q. Yes. Is he another person that you</p> <p>22 hired in as a technical director within OCTO?</p> <p>23 A. Yes.</p> <p>24 Q. Now, at some point did Evren transfer</p> <p>25 to a PM ladder?</p>

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122 to 125

<p style="text-align: right;">Page 122</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. When he left OCTO he went into a</p> <p>2 probationary product management role, that's</p> <p>3 correct.</p> <p>4 Q. PM stands for Product Management?</p> <p>5 A. Yes.</p> <p>6 Q. So he had skills that were</p> <p>7 transferable from TSC to PM?</p> <p>8 A. That's why he was put in a</p> <p>9 probationary period, was to determine whether that</p> <p>10 was true or not.</p> <p>11 Q. And do you know the outcome of that?</p> <p>12 A. He's a product manager today, so...</p> <p>13 Q. Okay, and with respect to the</p> <p>14 engineering levelling guide that we looked at a</p> <p>15 bit ago with respect to Levels 8 and 9 in those</p> <p>16 four different categories for the PM manager role</p> <p>17 as you observed it at Google, do these descriptors</p> <p>18 apply to that ladder?</p> <p>19 A. Generally, yes, but again as states</p> <p>20 in the doc it doesn't represent the specific</p> <p>21 expectations for any job role including PM, SWE,</p> <p>22 or TSC.</p> <p>23 Q. Right. This is an Engineering-Wide</p> <p>24 Levelling Guide?</p> <p>25</p>	<p style="text-align: right;">Page 124</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Okay. If you want to look at Tab</p> <p>2 73 -- oh, actually, don't look at it yet. I</p> <p>3 apologize.</p> <p>4 MS. GREENE: Ken, if you want to look</p> <p>5 at Tab 73.</p> <p>6 MR. GAGE: You just have to speed up</p> <p>7 the transmission to me, Cara, they're still</p> <p>8 slow in coming to me. I don't know why. And</p> <p>9 my son is not home from school yet, so I know</p> <p>10 it's not the video games he plays that are</p> <p>11 eating up the bandwidth.</p> <p>12 Okay 73, you said?</p> <p>13 MS. GREENE: Yes.</p> <p>14 MR. GAGE: Go ahead.</p> <p>15 Q. Okay. If you can take a look at</p> <p>16 this document, we're going to Bates stamp this as</p> <p>17 Exhibit 88 -- Bates -- I'm sorry, we're going to</p> <p>18 mark it as Exhibit 88, Bates stamp</p> <p>19 GOOG-ROWE-00059393 through 442.</p> <p>20 (Whereupon, Exhibit 88 was marked for</p> <p>21 identification.)</p> <p>22 Q. So if you look in the upper</p> <p>23 right-hand corner of this first page and read that</p> <p>24 and tell me if it ref -- refreshes your</p> <p>25</p>
<p style="text-align: right;">Page 123</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 A. Yeah, this is -- yeah, there's an</p> <p>2 engineering category of jobs and then the job</p> <p>3 families, so this is for an engineering category</p> <p>4 of jobs.</p> <p>5 Q. So this is the -- the broader set and</p> <p>6 then an individual ladder may have its own levels</p> <p>7 defined as well, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And so earlier we looked at this when</p> <p>10 we discussed the TSC ladder itself was well,</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. All right. Do you know a woman or</p> <p>14 aware of a woman named [REDACTED]?</p> <p>15 A. Yes.</p> <p>16 Q. And how are you aware of her?</p> <p>17 A. She was being considered for a role</p> <p>18 in OCTO.</p> <p>19 Q. And was she offered a role?</p> <p>20 A. She was.</p> <p>21 Q. And do you recall at what level she</p> <p>22 was offered a role?</p> <p>23 A. I think it was L 9, but I'm not a</p> <p>24 hundred percent sure.</p> <p>25</p>	<p style="text-align: right;">Page 125</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 recollection about what level she was being</p> <p>2 proposed for.</p> <p>3 A. Yes.</p> <p>4 Q. Okay, and how does it refresh your</p> <p>5 recollection; what do you recall?</p> <p>6 A. Oh, okay. L 9.</p> <p>7 Q. Okay, and do you recall whether you</p> <p>8 made a recommendation with respect to her level?</p> <p>9 A. I did. I submitted a statement of</p> <p>10 support as I do for all candidates we hire.</p> <p>11 Q. Okay, and looking at Ms. Walsh and</p> <p>12 her education, do you know whether a Master of</p> <p>13 Arts and/or a Bachelor of Arts are positions</p> <p>14 that -- are degrees that Google would consider</p> <p>15 relevant to the position for which you were</p> <p>16 hiring?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I can't put myself in the position of</p> <p>19 determining what Google would assess or not</p> <p>20 assess. I can tell you as a hiring manager we</p> <p>21 look at a range of characteristics in the person's</p> <p>22 background, including practical experience and</p> <p>23 education.</p> <p>24 Q. Do you -- have you seen any Google</p> <p>25</p>

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<p style="text-align: right;">Page 130</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 Q. Okay. We're going to mark this as</p> <p>2 Exhibit 89 and you can go ahead and open it now,</p> <p>3 Tab 78 and we're going mark this as</p> <p>4 GOOG-ROWE-00059503 through 508.</p> <p>5 (Whereupon, Exhibit 89 was marked at</p> <p>6 this time.)</p> <p>7 Q. Okay. I would like you to turn first</p> <p>8 to the third page of this document, the one with</p> <p>9 the chart on it.</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall receiving this chart?</p> <p>12 A. I -- I mean, I don't remember every</p> <p>13 chart I've been sent, but it looks like it was</p> <p>14 sent to me from [REDACTED]. It appears --</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. It appears from the e-mail it's been</p> <p>17 appended into a note she sent to me.</p> <p>18 Q. Do you have any understanding of how</p> <p>19 this package compared to packages that were</p> <p>20 offered to men in OCTO at the Level of 9?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. No, I -- and as I mentioned earlier,</p> <p>23 I usually don't see the offers themselves. This</p> <p>24 is highly unusual when a candidate sends me their</p> <p>25</p>	<p style="text-align: right;">Page 132</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 as Exhibit 90, Bates stamped GOOG-ROWE-00056473</p> <p>2 through 76.</p> <p>3 (Whereupon, Exhibit 90 was marked for</p> <p>4 identification.)</p> <p>5 Q. If you can, first look at the second</p> <p>6 page of this document.</p> <p>7 A. Second page?</p> <p>8 Q. Yes.</p> <p>9 A. Okay.</p> <p>10 Q. And I would like you to look at the</p> <p>11 bottom half of your e-mail from May 29, 2018.</p> <p>12 A. Okay.</p> <p>13 Q. Do you see where you say "PLs; DR."</p> <p>14 A. Yes.</p> <p>15 Q. What is that?</p> <p>16 A. It's an abbreviation in computer</p> <p>17 science. We use it to say too long, didn't read.</p> <p>18 It's like a summary statement.</p> <p>19 Q. And what was too long that you didn't</p> <p>20 read?</p> <p>21 A. Yeah, in -- in case people don't want</p> <p>22 to read the entire thing. That's kind of the</p> <p>23 summary of it.</p> <p>24 Q. Got it. And your summary, is that it</p> <p>25</p>
<p style="text-align: right;">Page 131</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 offer.</p> <p>2 Q. Okay. If you go to page -- the first</p> <p>3 page of this document. You write, "I agree. I</p> <p>4 also know that every woman who came to</p> <p>5 Google/OCTO, [REDACTED], Ulku, have told me they feel</p> <p>6 like they didn't fight hard enough for</p> <p>7 themselves," signed one. At the time you made</p> <p>8 that statement, was that a true statement?</p> <p>9 A. Yes.</p> <p>10 Q. Okay, and then with respect to the</p> <p>11 next paragraph you write, "This is also the Number</p> <p>12 1 area where women ask for my advice/mentoring</p> <p>13 respectfully fighting for what they think is fair</p> <p>14 comp." Was that also a true statement at the time</p> <p>15 you made it?</p> <p>16 A. Yes.</p> <p>17 Q. You can put that aside and I next</p> <p>18 would like you to look at Tab 79.</p> <p>19 MS. GREENE: Does everyone have that</p> <p>20 up?</p> <p>21 MR. GAGE: Not yet.</p> <p>22 A. I've got it.</p> <p>23 MR. GAGE: Go ahead.</p> <p>24 Q. All right. We're going to mark this</p> <p>25</p>	<p style="text-align: right;">Page 133</p> <p style="text-align: center;">- WILL GRANNIS -</p> <p>1 was what?</p> <p>2 A. Not intervening.</p> <p>3 Q. Rachel Quirk writes at 10:20 a.m., "I</p> <p>4 agree with Will completely. [REDACTED]'s last response</p> <p>5 to escalate to Diane Greene and Brian Seaman is</p> <p>6 not Googley. " Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Do you agree that that was not</p> <p>9 Googley of her?</p> <p>10 A. Yeah, -- I don't know that I -- I</p> <p>11 don't know that I'd frame it as Googley or not</p> <p>12 because we have a pretty strict rubric for</p> <p>13 Googley or a pretty defined rubric that we went</p> <p>14 over earlier, but I think it exercised poor</p> <p>15 judgment.</p> <p>16 Q. Okay. If you can, go back to the</p> <p>17 first page now.</p> <p>18 A. Okay.</p> <p>19 Q. Rachel Quirk at the bottom shares</p> <p>20 Diane's response. Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And is that referring to Diane</p> <p>23 Greene?</p> <p>24 A. I didn't write the e-mail. I can't</p> <p>25</p>